

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

---

Jared Goyette, Craig Lassig, and The  
Communications Workers of America,  
*On behalf of themselves and other  
similarly situated individuals,*

Court File No. 20-cv-01302-WMW-DTS

Plaintiffs,

v.

**DECLARATION OF CRAIG LASSIG**

City of Minneapolis; Minneapolis Chief of  
Police Medaria Arradondo *in his  
individual and official capacity;*  
Minneapolis Police Lieutenant Robert  
Kroll, *in his individual and official  
capacity;* Minnesota Department of Public  
Safety Commissioner John Harrington, *in  
his individual and official capacity,*  
Minnesota State Patrol Colonel Matthew  
Langer, *in his individual and official  
capacity;* John Does 1-2, *in their  
individual and official capacities.*

Defendants.

---

I, Craig Lassig state as follows:

1. I am a Minnesota resident and freelance photographer. I have been a freelancer since 2008, and my clients include AP, Reuters, the NY Times, and the European Pressphoto Agency (“EPA”). Prior to 2008, I worked as a photographer for Sun Newspapers.

2. On May 30, I was covering the George Floyd protests for EPA, along with another EPA photographer, Tannen Maury, who had traveled to Minneapolis from

Chicago to cover the protests with me. Another freelance photojournalist, Stephen Muren, was with us.

3. Tannen, Stephen and I were documenting protests occurring near the 5<sup>th</sup> precinct police station in Minneapolis, at 31<sup>st</sup> and Nicollet. Early that evening, the police began to disburse the protesters, pushing them up 1<sup>st</sup> Avenue toward downtown. Police fired tear gas and less-lethal projectiles. I saw them shoot protesters who were running away in the back with less-lethal projectiles.

4. Because the situation had gotten violent, Tannen, Stephen and I left the scene and proceeded up Nicollet Avenue to regroup and decide what to do next. We stopped in the parking lot of a restaurant on Nicollet Avenue to discuss where we should go next. We were nowhere near any protesters, and we were the only three individuals standing in the parking lot. Likewise, there were no police in sight.

5. As we stood in the parking lot talking, several police vehicles drove down 28th Avenue in front of the restaurant. One of the cruisers stopped and officers got out, wearing blue shirts. We had our press badges on at the time, as well as all of our professional camera gear. We verbally identified ourselves as the media to these officers. One said, “we don’t fucking care,” and ordered us onto the ground. We complied. They handcuffed us, searched all our belongings, and seized our photography gear. Then they placed us, handcuffed, into a police van and drove us downtown. We sat in the van for about an hour. Then we were booked, fingerprinted, and cited for violating the curfew. After roughly two hours in custody total, we were released.

6. Earlier that evening, Tannen and I had been with a larger group of journalists covering the protests near the precinct, including an NBC film crew. I saw police mace journalists, deliberately shoot journalists with less-lethal projectiles, and chase journalists, all of whom were clearly identified as journalists, were standing apart from the protesters, and were not obstructing or provoking the police. I was shocked at the aggressive tactics and hostile approach of the police.

**I declare under penalty of perjury under the laws of United States of America  
that the foregoing is true and correct to the best of my knowledge.**

Dated: June 7, 2020

/s/ Craig Lassig  
Craig Lassig